

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

1. GREAT LAKES INSURANCE SE,)	
)	
Plaintiff,)	
)	Case No. CIV-22-00702-JD
vs.)	Judge Jodi W. Dishman
)	
2. FREDY VALLE d/b/a VALLE)	
TRUCKING;)	
3. SILVER STAR CONSTRUCTION)	
COMPANY, INC.;)	
4. TYLON MACKEY;)	
5. ISRAEL JUAREZ;)	
6. ORD TRUCKING, INC.)	
7. ZURICH AMERICAN INS. CO.,)	
)	
Defendants,)	
)	
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8. ZURICH AMERICAN INS. CO.,)	
)	
Defendant/Third Party)	
Plaintiff,)	
)	
vs.)	
)	
9. PROGRESSIVE NORTHERN INS.)	
CO.,)	
)	
Third-Party Defendant.)	

**DEFENDANT/THIRD-PARTY PLAINTIFF ZURICH AMERICAN INSURANCE
COMPANY'S UNOPPOSED MOTION FOR ENTRY OF
AGREED PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c), Defendant/Third-Party Plaintiff Zurich American Insurance Company moves this Court to approve and enter the proposed Agreed Protective Order attached hereto as **Exhibit 1**.

1. The parties have been and are currently engaged in written discovery and document production.

2. Sensitive, private, confidential information and documents such as internal guideline-type documents, financial information, information regarding proprietary processes, proprietary business records, trade secrets, personal contact information of non-parties, and physical and mental healthcare records are likely to be requested and produced during the discovery phase of this litigation and used in court filings, depositions and expert witness analyses.

3. Certain documents and information have been requested in discovery which the parties believe to be confidential.

4. The parties have agreed to protect against the disclosure of certain information to persons outside the litigation through the proposed Agreed Protective Order.

5. The undersigned has contact counsel for Plaintiff Great Lakes Insurance SE, Defendants Silver Star Construction, Inc. and Tylon Mackey, and Third-Party Defendant Progressive Northern Insurance Company.¹ Counsel for each of these parties has agreed to the proposed Agreed Protective Order, and have no objection to its entry by the Court.

WHEREFORE, Defendant/Third-Party Plaintiff Zurich American Insurance Company respectfully requests that the Court enter the parties' Agreed Protective Order

¹ Defendant Fredy Valle d/b/a Valle Trucking has not yet entered an appearance or filed an Answer. Defendants Israel Juarez and ORD Trucking, Inc. were dismissed from this lawsuit on July 26, 2023. *See* Doc. No. 61.

attached hereto as Exhibit 1 and submitted contemporaneously herewith pursuant to the ECF Policies and Procedures Manual.

Respectfully Submitted,

ASTON | MATHIS | CAMPBELL PLLC

By s/Amy E. Hampton

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CERTIFICATE OF SERVICE

I, Amy E. Hampton, hereby certify that on this 28th day of September, 2023, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system:

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s/Amy E. Hampton
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